

NPL-U36-. -3-6-L1-R5

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To: Docket Coordinator
Headquarters
Environmental Protection Agency
CERCLA Docket Office
MAIL CODE 5201 G
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460

From: Cynthia and Frederick Carus
2209 Elmwood Road
Peru, Illinois 61354

Re: The National Priorities List for the Uncontrolled Hazardous Waste Sites, Proposed Rule #36.

We request the Matthiessen & Hegeler Zinc site not be placed on the NPL list. It is our opinion that the site does not present a public health threat. The HRS scoring numbers were arrived at incorrectly. This resulted in inflated test values, which brought the score above the 28.5 threshold level. Soil samples taken by IEPA containing material fused at high temperatures (cinker and smelter residues) were analyzed by destructive testing (a method which would include non-leachable metallic elements as well as leachable metallic elements) to determine the quantity of metallic elements present.

Water samples taken from the Little Vermilion River by the City of La Salle in a 1995 study indicates minimal to less than allowable limits of the heavy metals cadmium, lead and zinc. The City of LaSalle maintains a storm water sewer located on an eight-acre easement through the property with an outfall to the Little Vermilion River.

Surface Water Overland/Flood Migration Pathway was scored without water samples taken; therefore, the Component Score Sheet results are skewed and misleading.

The City of LaSalle's twenty-year test records of their well water system near the mouth of the Little Vermilion River indicate no detrimental levels of the heavy metals cadmium, lead and zinc.

Please find enclosed our comments concerning the proposed listing of Matthiessen & Hegeler Zinc Company in La Salle Illinois to the Super Fund National Priorities List (NPL).

Comments on HRS Documentation Record

Review Cover Sheet:

"Many of these were found to contain elevated levels of metals which are associated with the site." This statement is an assumption since there were at least three zinc smelters and three coal mines in the La Salle-Peru, Illinois. Background levels could be from all these sites.

- 1.) Illinois Zinc on Brunner Street with Number Nine coal mine.
- 2.) A zinc smelter in south east La Salle between third and fourth streets west of Union Street.
- 3.) Matthiessen & Hegeler smelter and coal mine east of ninth street plus the Old Kentucky Coal mine east of the Illinois Central Railroad track on the M & H site.

Page two - Component Score Sheet:

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Water samples taken from the Little Vermilion River by the City of La Salle in a 1995 Study indicates minimal to less than allowable limits of the heavy metals cadmium, lead and zinc. The City of LaSalle maintains a storm water sewer located on an eight-acre easement through the property with an outfall to the Little Vermilion River.

Surface Water Overland/Flood Migration Pathway was scored without water samples taken; therefore, the Component Score Sheet results are skewed and misleading.

2.0 Site Summary:

The facility stopped smelting zinc forty years ago in 1961 not 1968.

"The metals that were detected in the two sources which have been found to have migrated into the Little Vermilion River, which lies just east of source #1."

To be more accurate, the IEPA did find fused clinker and smelter residues rather than migrated run off. High heavy metal test results were found only after aggressive destructive testing methods that do not reflect the water conditions found in the Little Vermilion River.

"This possible contamination threatens approximately 9,881 people living within a one mile radius of the site."

This is an inappropriate scare tactic. This site does not threaten the residents of the City of LaSalle any more than the Illinois Zinc site eighteen blocks to the southwest threatens the residents of the City of Peru. The site has been here for 143 years and the smelter ceased operations forty years ago. The current public health records, to our knowledge, do not reflect problems related to the smelters. Current LaSalle County Health Department priorities are Substance abuse, family violence and access to dental and health care.

"The fence surrounding the site contains holes"

At this time we are not aware of holes in the surrounding fences.

2.2 Source Characteristics:

"Samples of wastepile material collected during the CERCLA....cadmium, copper, chromium, lead, nickel and zinc."

We do not think the chromium, copper and nickel came from this site as they are not part of the process or commonly found in zinc deposits. It is possible these metals migrated from upstream activities

The wastepile (ref # 10) is compacted and stable since there are not copious amounts of clinker and smelter residue at mouth of the Little Vermilion River

2.4.2 Hazardous Waste Quantity

It is important to note that the Matthiessen & Hegeler Zinc Company operation, located itself on the energy source of two coal mines and operated the smelter for 103 years. The coal mine shale and clay along with clinker and smelter residue was continuously placed on the site filling in ravines to the river and changing the elevation significantly. Not all the material should be considered hazardous waste. Therefore the assigned values of 19,983 and 51,126 are questionable.

4.1 Overland / Flood Migration Component

We do not think the chromium, copper and nickel found in the sediment samples in the Little Vermilion River comes from this site. It is our opinion they come from an upstream activity.

4.1.1.1 Definition of Hazardous Substance Migration Path

We have an agreement with the City of LaSalle that the old collapsed storm sewer was to be filled in and the drainage path stopped in consideration of the new four acres storm sewer easement. The City is responsible for eight acres of easement property. This project made a great improvement in managing the storm water from LaSalle. The City maintains and monitors this outflow.

4.1.2.1.1 Observed Release

To be more accurate, the IEPA did find fused clinker and smelter residues rather than migrated run off. High heavy metal test results were found only after aggressive destructive testing methods that do not reflect the water conditions found in the Little Vermilion River.

Background Concentration

We think that the metallic analysis of upstream samples are impacted by other sources of manufacturing and mining activity.

Attribution

"There are no other known sources of metals located upstream of or along side of the Matthiessen & Hegeler property."

This is an inaccurate statement. The Apollo Metal Works, a plating manufacturer, had a facility directly north and upstream of the M & H site.

Over one hundred species of trees, shrubs, grasses, weeds and prairie plants have established themselves voluntarily in the older, northern sections of the site (R. Schulenberg, Morton Arboretum). We have purposely paid the taxes, limited the activity and prevented disruption to the site. We believe in private ownership and have no desire to see this property be a public recreational greenway over an old industrial site.

A handwritten signature in cursive script, appearing to read "Cynthia Carus".

Respectfully,

A handwritten signature in cursive script, appearing to read "Frederick R. Carus".

Cynthia Carus
Frederick Carus